UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	77
UNITED STATES OF AMERICA	X : : : <u>SEALED INDICTMENT</u>
KAWAIN NELSON, a/k/a "Kobe," a/k/a "Kobi," a/k/a "Slope,"	18 Cr. () 18 CRIM 454
JAMES CROOMS, a/k/a "Butter," ANTHONY CORLEY, a/k/a "Tone," ALBERT COLLINS, a/k/a "A," DARRELL HUDSON,	: : : : : : : :
a/k/a "Skip," JONATHAN PADILLA, SILVIO CIPRIAN, a/k/a "T.P.," LAMAR GRIFFIN, a/k/a "Louch," JACKIE COOPER,	USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#: DATE FILED: 62618
a/k/a "Jack," SHARON HATCHER, ALLEN WALKER, a/k/a "Fat Boy," and EFRAIN REYES, a/k/a "Stone,"	
Defendants.	: : : X

COUNT ONE (Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2016 up to and including in or about June 2018, in the Southern District of New York and elsewhere, KAWAIN NELSON, a/k/a "Kobe," a/k/a "Kobi," a/k/a "Slope," JAMES CROOMS, a/k/a "Butter," ANTHONY CORLEY,

a/k/a "Tone," ALBERT COLLINS, a/k/a "A," DARRELL HUDSON, a/k/a "Skip," JONATHAN PADILLA, SILVIO CIPRIAN, a/k/a "T.P.," LAMAR GRIFFIN, a/k/a "Louch," JACKIE COOPER, a/k/a "Jack," SHARON HATCHER, ALLEN WALKER, a/k/a "Fat Boy," and EFRAIN REYES, a/k/a "Stone," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

- 2. It was a part and an object of the conspiracy that KAWAIN NELSON, a/k/a "Kobe," a/k/a "Kobi," a/k/a "Slope," JAMES CROOMS, a/k/a "Butter," ANTHONY CORLEY, a/k/a "Tone," ALBERT COLLINS, a/k/a "A," DARRELL HUDSON, a/k/a "Skip," JONATHAN PADILLA, SILVIO CIPRIAN, a/k/a "T.P.," LAMAR GRIFFIN, a/k/a "Louch," JACKIE COOPER, a/k/a "Jack," SHARON HATCHER, ALLEN WALKER, a/k/a "Fat Boy," and EFRAIN REYES, a/k/a "Stone," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).
- 3. The controlled substances that KAWAIN NELSON, a/k/a "Kobe," a/k/a "Kobi," a/k/a "Slope," JAMES CROOMS, a/k/a "Butter," ANTHONY CORLEY, a/k/a "Tone," ALBERT COLLINS, a/k/a "A," DARRELL HUDSON, a/k/a "Skip," JONATHAN PADILLA, SILVIO CIPRIAN, a/k/a "T.P.," LAMAR GRIFFIN, a/k/a "Louch," JACKIE

COOPER, a/k/a "Jack," SHARON HATCHER, ALLEN WALKER, a/k/a "Fat Boy," and EFRAIN REYES, a/k/a "Stone," the defendants, conspired to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A); (2) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (3) mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, KAWAIN NELSON, a/k/a "Kobe," a/k/a "Kobi," a/k/a "Slope," JAMES CROOMS, a/k/a "Butter," ANTHONY CORLEY, a/k/a "Tone," ALBERT COLLINS, a/k/a "A," DARRELL HUDSON, a/k/a "Skip," JONATHAN PADILLA, SILVIO CIPRIAN, a/k/a "T.P.," LAMAR GRIFFIN, a/k/a "Louch," JACKIE COOPER, a/k/a "Jack," SHARON HATCHER, ALLEN WALKER, a/k/a "Fat Boy," and EFRAIN REYES, a/k/a "Stone," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner

or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

- 5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third person;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of each defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

FOREPERSON

GEOFFREY S.VBERMAN (***) United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

Defendants.

SEALED INDICTMENT 18 Cr. ____ () (Title 21, United States Code, Section 846.) GEOFFREY S. BERMAN United States Attorney. A TRUE BILL Foreperson.

6/26/18

Filed Indictment under seal Ascest warrants is seed

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